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Attorneys for Plaintiff  
GOPRO, INC.

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

GOPRO, INC.

Plaintiff,

v.

C&A MARKETING, INC., C&A  
LICENSING, LLC, AND PLR IP  
HOLDINGS, LLC,

Defendants.

AND RELATED COUNTERCLAIMS

Case No. 3:16-cv-03590-JST

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND TIME TO SERVE  
DAMAGES CONTENTIONS AND  
RESPONSIVE DAMAGES  
CONTENTIONS**

Complaint Filed: June 27, 2016

STIPULATION AND ~~PROPOSED~~ ORDER TO EXTEND TIME  
Case No. 3:16-cv-03590-JST

1 Pursuant to Local Rule 6-1(b), Plaintiff GoPro, Inc. (“GoPro”) and Defendants C&A  
2 Marketing, Inc.; C&A Licensing, LLC; and PLR IP Holdings, LLC (“Defendants”) hereby  
3 stipulate as follows:

4 WHEREAS, the Northern District of California revised its Patent Local Rules on  
5 January 17, 2017;

6 WHEREAS, these revised Patent Local Rules now require the exchange of Damages  
7 Contentions and Responsive Damages Contentions under Patent Local Rule (“Patent L.R.”) 3-8  
8 and 3-9, respectively;

9 WHEREAS, Patent L.R. 3-8 and 3-9 contemplate the prior identification of information  
10 and production of documents relating to damages under Patent L.R. 3-1(h), 3-2(f)–(j), and 3-4(c)–  
11 (e);

12 WHEREAS, GoPro previously served Infringement Contentions under Patent L.R. 3-1,  
13 and the parties produced documents pursuant to Patent L.R. 3-2 and 3-4 prior to the revision of  
14 the Patent Local Rules;

15 WHEREAS, the parties’ compliance with these new Patent Local Rules relating to  
16 damages would assist their completion of Damages Contentions and Responsive Damages  
17 Contentions;

18 IT IS HEREBY STIPULATED AND AGREED that on April 5, 2017, GoPro will serve  
19 amended Infringement Contentions, amended only to “[i]dentify the timing of the point of first  
20 infringement, the start of claimed damages, and the end of claimed damages,” pursuant to Patent  
21 L.R. 3-1(h);

22 IT IS FURTHER STIPULATED AND AGREED that on April 5, 2017, the parties will  
23 produce documents responsive to Patent L.R. 3-2(f)–(j) and 3-4(c)–(e) and in compliance with  
24 Patent L.R. 3-2 and 3-4;

25 IT IS FURTHER STIPULATED AND AGREED that GoPro will serve its Patent L.R. 3-8  
26 Damages Contentions on May 25, 2017 (50 days after service of its amended Infringement  
27 Contentions);

IT IS FURTHER STIPULATED AND AGREED that Defendants will serve their Patent L.R. 3-9 Responsive Damages Contentions on June 26, 2017 (30 days after service of the Damages Contentions).

The parties previously stipulated to extend time to respond to the Complaint, to continue the initial case management conference, and to serve invalidity contentions and exchange preliminary claim constructions. This extension will not otherwise affect the schedule for the case.

Dated: March 7, 2017

Dated: March 7, 2017

/s/ Mehrnaz Boroumand Smith

/s/ Nathan B. Sabri

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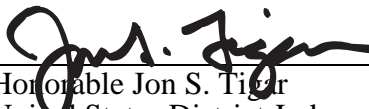
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Holdings, LLC

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: March 9, 2017

  
Honorable Jon S. Tiger  
United States District Judge